

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERROL RUDMAN and RUDMAN PARTNERS
LP, on behalf of themselves and all others
similarly situated,

Plaintiffs,

-against-

CHC GROUP LTD., WILLIAM J. AMELIO,
JOAN S. HOOPER, REBECCA CAMDEN,
WILLIAM E. MACAULAY, JONATHAN
LEWS, KENNETH W. MOORE, J.P. MORGAN
SECURITIES LLC, BARCLAYS CAPITAL
INC., UBS SECURITIES LLC, HSBC
SECURITIES (USA) INC., RBC CAPITAL
MARKETS, LLC, WELLS FARGO
SECURITIES, LLC, BNP PARIBAS
SECURITIES CORP., STANDARD BANK
PLC, CORMARK SECURITIES (USA) LTD.,
COWEN AND COMPANY, LLC, RAYMOND
JAMES & ASSOCIATES, INC., SIMMONS &
COMPANY, INTERNATIONAL, and TUDOR,
PICKERING, HOLT & CO. SECURITIES,
INC.,

Defendants.

Case No. 15 Civ. 3773 (LAK)

HON. LEWIS A. KAPLAN

ECF Case

Class Action

**NOTICE OF PLAINTIFFS' COUNSEL'S MOTION
FOR AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(h) and 54(d)(2) and this Court's June 28, 2017 Order Granting Conditional Class Certification, and Providing for Notice (ECF No. 67), and upon the accompanying: (i) Declaration of Ira M. Press in Support of Final Approval of the Proposed Class Action Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses, and Reimbursement of Litigation Expenses, dated August 28, 2017; (ii) the Memorandum of Law in Support of Plaintiffs' Counsel's Motion for Award of Attorneys' Fees and Reimbursement of Litigation Expenses; and (iii) all other papers

and proceedings herein, Lead Plaintiffs Errol Rudman and Rudman Partners L.P. will and do hereby move this Court, before the Honorable Lewis A. Kaplan, on October 2, 2017, at 4:00 p.m. in Courtroom 21B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or such other location and time as set by the Court, for entry of an Order awarding attorneys' fees and reimbursement of litigation expenses, plus any accrued interest, to Plaintiffs' Counsel.

Dated: August 28, 2017

Respectfully submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
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Lead Counsel for Class and Counsel for Lead Plaintiffs